REMARKS / DISCUSSION OF ISSUES

Claims 1, 3 – 11 and 15 are pending in the application. Claims 1, 11 and 15 are independent.

In the present response, claims 1, 11 and 15 are amended. The support for the claim amendments may be found in Applicants' specification, for example, page 6, lines 27 – 29. No new matter is added.

35 U.S.C. 103

The Office Action rejects claims 1, 3 – 6, 8, 11, 14 and 15 under 35 U.S.C. 103(a) over Iverson et al. (US Patent 5,852,664, hereinafter Iverson), in view of Hampapur et al. (US 2001/0003468 A1, hereinafter Hampapur).

Applicants submit that for at least the following reasons, claims 1, 3 – 6, 8, 11 and 15 are patentable over Iverson and Hampapur, either singly or in combination.

For example, claim 1, in part, requires:

> "*calculating a separate hash word from said parameters for each time frame; and*
>
> *deriving a hash function by a concatenation of the hash words.*"

Applicants submit that Iverson does not disclose calculating a separate hash word from said parameters for each time frame, as claimed. Iverson, column 6, lines 20 -21, discloses that the encoder 300 uses the same access word to process each frame in the video sequence. Therefore, Iverson does not disclose a separate hash word for each time frame. Furthermore, Iverson, column 6, lines 56 – 64, discloses a formula for the hash function. However, the hash function as defined by Iverson is clearly not a concatenation of the hash words, as claimed. Therefore, Iverson fails to teach or suggest the above claimed features.

Applicants submit that although Hampapur, paragraph [0006], discloses the extraction of metadata from the actual video data, Hampapur does not teach or suggest any derivation of a hash function from the metadata. Hampapur only

discloses that the metadata is stored in a database system (paragraph [0005]), but does not disclose any hash functions, or a hash function derived from a concatenation of hash word. Therefore, the combined teachings of Iverson and Hampapur still fail to disclose calculating a separate hash word from said parameters for each time frame; and deriving a hash function by a concatenation of the hash words, as claimed.

In view of at least the foregoing, Applicants submit that claim 1 is patentable over Iverson and Hampapur, either singly or in combination.

Independent claim 11, in part, also requires:

> "*calculating a separate hash word from said parameters for each time frame; and*
>
> *deriving a hash function by a concatenation of the hash words.*"

Furthermore, independent claim 15, in part, requires:

> "*calculating a separate hash word from said parameters for each time frame; and*
>
> *deriving a hash function by a concatenation of the hash words.*"

Applicants essentially repeat the above arguments for claim 1, and apply them to claims 11 and 15, pointing out why the combined teachings of Iverson and Hampapur fail to teach the above claimed features. Therefore, for at least the above reasons, claims 11 and 15 are patentable over Iverson and Hampapur, either singly or in combination. Claims 3 – 6 and 8 depend from and inherit all the features of claim 1. Therefore, claims 3 – 6 and 8 are patentable for at least the reasons discussed above with respect to claim 1, with each claim containing further distinguishing features.

Under 35 U.S.C. 103(a), the Office Action rejects claim 7 over Iverson, in view of Hampapur, and further in view of Makiyama et al. (US Patent 6,687,409 B1); claim 9 over Iverson, in view of Hampapur, and further in view of Krapp et al. (US 2002/0169934 A1); and claim 10 over Iverson, in view of Hampapur, and further in view of Levine (US Patent 6,266,644 B1).

Applicants submit that none of the cited secondary references can in any way cure the defects pointed out above in Iverson and Hampapur with respect to claim 1.

Claims 7, 9 and 10 depend from and inherit all the features of claim 1. Thus, claims 7, 9 and 10 are patentable for at least the reason that they depend from claim 1, with each claim containing further distinguishing features.

Withdrawal of the rejection of claims 1, 3 – 11 and 15 under 35 U.S.C. §103(a) is respectfully requested.

Conclusion

In view of the foregoing, Applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

/Hay Yeung Cheung/
By: Hay Yeung Cheung
       Registration No.: 56,666
       Myers Wolin, LLC
       Phone: (973) 401-7157

Please direct all correspondence to:
Corporate Counsel
U.S. PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001

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